

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

G.F.F.; and J.G.O.; on their own behalf and on
behalf of others similarly-situated,

Petitioners–Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Respondents–Defendants.

Case No: 1:25-cv-02886

**[PROPOSED ORDER] GRANTING
TEMPORARY RESTRAINING ORDER**

Upon consideration of Petitioners-Plaintiffs’ Motion for a Temporary Restraining Order,
and any opposition, reply, and further pleadings and argument thereto:

Having determined that Petitioners-Plaintiffs (“Petitioners”) are likely to succeed on the
merits of their claims that the Proclamation violates the Alien Enemies Act (“AEA”), 50 U.S.C.
§ 21 *et seq.*; that the AEA does not authorize Respondents-Defendants (“Respondents”) to
summarily remove them from the United States; that Respondents’ actions implementing
removals under the AEA violate due process, the Immigration and Nationality Act, and statutes
providing protection for those seeking humanitarian relief; that Petitioners will suffer irreparable
injury in the absence of injunctive relief; and that the balance of hardships and public interest
favor temporary relief, it is, therefore,

ORDERED that Petitioners’ Motion for a Temporary Restraining Order is hereby
GRANTED; that the proposed class is provisionally certified; and that Respondents, their agents,
representatives, and all persons or entities acting in concert with them are hereby:

1. **ORDERED**, pending further order of this Court, not to remove Petitioners, or any members of the putative class, from the United States under the Presidential Proclamation entitled “Invocation of the Alien Enemies Act Regarding the Invasion of The United States by Tren De Aragua”;
2. **ORDERED**, pending further order of this Court, not to transfer Petitioners, or any members of the putative class, from the District; and,
3. **ORDERED**, pending further order of this Court, that insofar as any Petitioners, or any members of the putative class, are in the process of being removed or have already been removed from the United States pursuant to the Proclamation, but remain within the custody, control, and/or jurisdiction of the United States, such individuals shall be returned to the United States.

It is further **ORDERED** that Petitioners shall not be required to furnish security for costs.

Entered on _____, 2025 at _____ a.m./p.m.

United States District Court Judge